



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

KMT:TH/MKP  
F. #2017R01840

*271 Cadman Plaza East  
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January 23, 2019

By Hand and ECF

The Honorable Nicholas G. Garaufis  
United States District Judge  
United States District Court  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Keith Raniere, et al.  
Criminal Docket No. 18-204 (NGG) (S-1)

Dear Judge Garaufis:

The government respectfully submits this letter to address the defendants' sealing of certain pretrial motions filed on January 9 and 10, 2019. (Docket Nos. 269, 271-274 and 275-277). In an abundance of caution, the government has filed its opposition to the defendants' motions under seal. (Docket Nos. 299, 300). However, in the government's view, the parties' submissions related to these motions should be unsealed, either in part or in full. See Lugosch v. Pyramid Co. of Onondaga, 435 F.3d 110, 124 (2d Cir. 2006) ("[C]ontinued sealing of . . . documents may be justified only with specific, on-the-record findings that sealing is necessary to preserve higher values and only if the sealing order is narrowly tailored to achieve that aim."). The government addresses each set of sealed filings in turn and what, if any, relief it seeks from the Court.

First, Clare Bronfman, Kathy Russell and Nancy Salzman's motion for severance and accompanying briefing (Docket Nos. 275-277) were filed entirely under seal.<sup>1</sup> Aside from the exhibits appended to the motion, a reference to certain individuals' medical history and a few descriptions of collateral that have not been publicly disclosed, there appears to be no compelling reason to seal the severance motion. See, e.g., United States v. Cicale, No. 05-CR-60-2 (NGG), 2018 WL 388941, at \*5 (E.D.N.Y. Jan. 11, 2018) (ordering documents unsealed subject to specified redactions). In an abundance of caution, the government has filed its opposition under seal. However, the government respectfully

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<sup>1</sup> Lauren Salzman's motion for severance (Docket No. 267) was not filed under seal.

